

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COLBY FRONTERHOUSE,

[DOB: 10/20/1979]

Defendant.

No. 21-3024-01-CR-S-BP

COUNT 1

18 U.S.C. § 2251(a) and § 2251(e)

NLT 15 Years Imprisonment

NMT 30 Years Imprisonment

NMT \$250,000 Fine

NLT 5 Years or Life Supervised Release

Class B Felony

COUNT 2

18 U.S.C. § 1470

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 years Supervised Release

Class C Felony

FORFEITURE ALLEGATION

18 U.S.C. § 1467

18 U.S.C. § 2253

\$100 Special Assessment

(Each Count of Conviction)

\$5,000 JVTA Special Assessment

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Sexual Exploitation of a Child)

18 U.S.C. § 2251(a)

18 U.S.C. § 2252(e)

Beginning on September 2, 2020, and continuing through September 6, 2020, in Christian County, such dates being approximate, in the Western District of Missouri, **COLBY FRONTERHOUSE**, the defendant, did employ, use, persuade, induce, entice, and coerce a minor, John Doe (DOB ***/**/2006), to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been

mailed, shipped, and transported in interstate commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 2

(Transfer of Obscene Matter to a Minor)

18 U.S.C. § 1470

Beginning on September 2, 2020, and continuing through September 6, 2020, such dates being approximate, in Christian County, in the Western District of Missouri, **COLBY FRONTERHOUSE**, the defendant, did, by means of interstate commerce, knowingly transfer obscene matter to John Doe (DOB **/**/2006) who had not attained the age of 16 years, knowing that John Doe (DOB **/**/2006) had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

FORFEITURE ALLEGATION

(Criminal Forfeiture)

18 U.S.C. § 1467

18 U.S.C. § 2253

28 U.S.C. § 2461

The allegations contained in Count 1 and Count 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 1467 and 2253.

Pursuant to Title 18, United States Code, Sections 1467 and 2253, upon conviction of an offense in violation of Title 18, United States Code Section 2251, and Title 18, United States Code Section 1470, the defendant shall forfeit to the United States of America:

1. Any visual depiction described in Title 18, United States Code, section 2251, 2251A, 2252, 2252A, or 2260, or any book magazine periodical, film, videotape, or other matter which contains an visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United State Code, Chapter 110;
2. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

3. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses, or any property traceable to such property.

The property to be forfeited includes, but is not limited to, an Apple iPhone XS, bearing serial number G0NXT19YKPFT, seized on or about January 26, 2021.

SUBSTITUTE ASSETS

If any of the property describe above, as a result of any act or omission of the defendant:

1. Cannot be located upon the exercise of due diligence;
2. Has been transferred or sold to, or deposited with, a third party;
3. Has been placed beyond the jurisdiction of the court;
4. Has been substantially diminished in value; or
5. Has been commingled with other property which cannot be divided without difficulty,

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

A TRUE BILL.

/s/ Kevin Elliott

FOREPERSON OF THE GRAND JURY

/s/ Stephanie Wan

STEPHANIE L. WAN

Assistant United States Attorney
MO Bar #58918

Dated: 02/23/2021

Springfield, Missouri